

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: SHELLEY DIXON</b>	<b>:</b>	<b>CHAPTER 13</b>
	<b>:</b>	
<b>DEBTOR</b>	<b>:</b>	<b>CASE No.: 19-12916</b>
<b>v.</b>	<b>:</b>	
<b>Ally Financial</b>	<b>:</b>	

**MOTION TO DETERMINE VALUE**

Debtor, Shelley Dixon seeks a determination of Ally Financial (“Creditor”) claim under section 506 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 3012, and respectfully represent:

1. Movant seeks a determination of Creditor’s secured claim for a 2013 Kia Rio (“Vehicle”).
2. Creditor filed proof of claim No. 4 seeking a secured claim of \$6,875. A copy of the proof of claim is attached as Exhibit “A”.
3. The vehicle has approximately 90,000 miles and is (6) six years old.
4. Debtor contends that based on the age and condition of the vehicle and an Edmunds report, that the present retail value of the Vehicle is not greater than \$4,430. See a copy of an Edmunds print out for \$4,430. Attached hereto as Exhibit “B”.

**WHEREFORE,** Debtor requests this Honorable Court disallow the Proof of Claim No. 4 as filed by Ally Financial and enter an Order consistent with the debtors proposed Order.

Respectfully Submitted,

/s/ Michelle Lee  
Michelle Lee, Esquire  
Law Offices of Georgette Miller Esq., P.C  
119 S. Easton Road  
Glenside, PA 19038

Dated: September 23, 2019